

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:
YELLOW CORPORATION, *et al.*¹
Debtors.

Chapter 11
Case No. 23-11069 (CTG)
(Jointly Administered)

**AMENDED MFN PARTNERS, LP AND MOBILE STREET HOLDINGS, LLC'S
WITNESS AND EXHIBIT LIST FOR HEARING ON JUNE 17, 2025**

MFN Partners, LP (“MFN”) and Mobile Street Holdings, LLC (“Mobile Street” and collectively, the “MFN Parties”) by and through their undersigned counsel, hereby submits this witness and exhibit list (the “Witness and Exhibit List”) for the hearing scheduled for **June 17, 2025 at 10:00 a.m. (E.T.)** (the “Hearing”) before the Honorable Craig T. Goldblatt at the United States Bankruptcy Court for the District of Delaware, located at 824 N. Market Street, 3rd Floor, Courtroom No. 7, Wilmington, Delaware 19801, in connection with the *Motion of MFN Partners, LP and Mobile Street Holdings, LLC for Entry of an Order Converting the Debtors' Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code* [Docket No. 6204] and any other matters scheduled to go forward at the Hearing.

WITNESSES

Pursuant to agreement reached with the Debtors, the MFN Parties, and the Committee will not call any live witnesses. The MFN Parties reserve the right to cross-examine any witness called by any other party.

¹ A complete list of each of the debtors in these chapter 11 cases (the “Debtors”) may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq.com/YellowCorporation>. The location of the Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 10990 Roe Avenue, Overland Park, Kansas 66211.

EXHIBITS

The MFN Parties may, if necessary, seek to introduce some or all of the following exhibits at the Hearing.

No.	Description	Docket, Bates or Deposition Exhibit No. (if available)
1.	First Day Motion Declaration of Matthew A. Doheny, Chief Restructuring Officer of Yellow Corporation	14
2.	Joinder of the Official Committee of Unsecured Creditors of Yellow Corporation, <i>et al.</i> , to Debtors Omnibus Objection to Personal Injury Claimant Motions for Relief from the Automatic Stay Under Section 362 of the Bankruptcy Code	886
3.	Statement of the Official Committee of Unsecured Creditors of Yellow Corporation, <i>et al.</i> , to Debtors Third, Fourth, and Fifth Omnibus (Substantive) Objections to Proofs of Claim for WARN Liability	2755
4.	Joinder of the Official Committee of Unsecured Creditors of Yellow Corporation, <i>et al.</i> , to Debtors Seventh Omnibus (Substantive) Objection to Proofs of Claim for Withdrawal Liability	3057
5.	[SEALED] Objection of the Official Committee of Unsecured Creditors Objection to the Motion of Debtors for Entry of an Order (I) Extending the Debtors Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof Pursuant to Section 1121 of the Bankruptcy Code and (II) Granting Related Relief	3511
6.	Response Statement of the Official Committee of Unsecured Creditors of Yellow Corporation, <i>et al.</i> , Regarding Motions for Summary Judgment Regarding Withdrawal Liability	3998
7.	Amended Memorandum Opinion on summary judgment motions re: withdrawal liability	4769
8.	Notice of Filing of Liquidation Analysis in Connection with the First Amended Disclosure Statement for the First Amended Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code	4829

9.	Memorandum Opinion regarding Motion for Reconsideration dated November 12, 2024	4846
10.	Order Approving (I) the Adequacy of the Disclosure Statement, (II) the Solicitation and Voting Procedures, (III) the Forms of Ballot and Notices in Connection Therewith, and (IV) Certain Dates with Respect Thereto	5024
11.	Second Amended Disclosure Statement [Solicitation Version]	5027
12.	Second Amended Joint Chapter 11 Plan	5028
13.	Order Relating to SFA MEPP Litigation Motions for Summary Judgment and Motions to Reconsider	5057
14.	Joinder of the Official Committee of Unsecured Creditors to Debtors Twenty-Fourth Omnibus (Substantive) Objection to the Proofs of Claim of the United States of America Filed on Behalf of the United States Environmental Protection Agency, the United States Department of the Interior, and the United States Department of Commerce, National Oceanic and Atmospheric Administration	5326
15.	Order Granting Direct Certification of Debtors', MFN Partners, LP's, and Mobile Street Holdings, LLC's Appeal to the United States Court of Appeals for the Third Circuit Pursuant to 28 U.S.C. § 158(d)(2)	5358
16.	Response Joinder of the Official Committee of Unsecured Creditors to Debtors' Twenty-Second Omnibus (Substantive) Objection to Claims Filed by Official Committee of Unsecured Creditors	5451
17.	Motion of the Official Committee of Unsecured Creditors for Entry of an Order Terminating the Debtors' Exclusive Period to Solicit Acceptances of a Plan or, in the Alternative, Converting the Chapter 11 Cases to Cases under Chapter 7 of the Bankruptcy Code	5564
18.	Objection of Debtors to Motion of the Official Committee of Unsecured Creditors for an Order Terminating the Debtors' Exclusive Period to Solicit Acceptances of a Plan or, in the Alternative, Converting the Chapter 11 Case to Cases Under Chapter 7 of The Bankruptcy Code	5613
19.	Objection of MFN Partners, LP and Mobile Street Holdings, LLC to the Motion of the Official Committee of Unsecured Creditors for Entry of an Order Terminating the Debtors' Exclusive Period to Solicit Acceptances of a Plan or, in the Alternative, Converting the Chapter 11 Cases to Cases under Chapter 7 of the Bankruptcy Code	5614
20.	Memorandum Opinion regarding cross motions for summary judgment on withdrawal liability dated February 5, 2025	5619

21.	Memorandum Opinion containing findings of fact and conclusions of law following trial on WARN Act claims dated February 26, 2025	5807
22.	Fourth Notice of Adjournment of Hearing to Consider Confirmation of the Debtors' Second Amended Joint Chapter 11 Plan and Related Voting and Objection Deadlines	5845
23.	Transcript for March 17, 2025 Hearing	5907
24.	Letter regarding Sub Judice Matters filed on 3/27/2025	5982
25.	Third Amended Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code	5995
26.	Third Amended Disclosure Statement for the Third Amended Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code	5996
27.	Plan Supplement for the Third Amended Joint Chapter 11 Plan of Yellow Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code	5997
28.	Letter Opinion in response to March 28, 2025 letter	5999
29.	Letter to the Honorable Craig T. Goldblatt Regarding Matters Related to this Court's March 31 Letter Opinion	6017
30.	Seventeenth Monthly Fee Application of Akin Gump Strauss Hauer & Feld LLP, as Lead Co-Counsel to the Official Committee of Unsecured Creditors of Yellow Corporation, et al. for the period December 1, 2024 to December 31, 2024	6024
31.	Memorandum Opinion Setting Forth Preliminary Observations on Remaining Multiemployer Pension Plan Claims Allowance Disputes dated April 7, 2025	6030
32.	Eighteenth Monthly Fee Application of Akin Gump Strauss Hauer & Feld LLP, as Lead Co-Counsel to the Official Committee of Unsecured Creditors of Yellow Corporation, et al. for the period January 1, 2025 to January 31, 2025	6046
33.	Motion of MFN Partners, LP And Mobile Street Holdings, LLC for Entry of and Order Converting the Debtors' Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code	6204

34.	Objection of Debtors to Motion of MFN Partners, LP and Mobile Street Holdings, LLC for Entry of an Order Converting the Debtors' Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code	6225
35.	Third Circuit order granting permission for the SFA appeal	
36.	Excel spreadsheet of MEPP claims summary referenced in the Debtors response to MFN Parties' interrogatory #4	Whittman Ex. 20 & Bates-stamp 24940
37.	Yellow Corporation Board Presentation dated January 27, 2025	Bates-stamp Debtors 2538-2560
38.	Yellow Corporation Board Presentation dates February 20, 2025	Bates-stamp Debtors 1978-2000
39.	Yellow Corporation Board Minutes and Attached Presentation dated March 20, 2025	Bates-stamp Debtors 24877-24909
40.	Yellow Corporation Board Minutes and Attached Presentation March 23, 2025	Bates-stamp Debtors 24910-24919
41.	Budget and Cash Flow Variance Week Ended March 21, 2025	Bates-stamp Debtors 10597-10602
42.	Akin and Huron Presentation to Debtors dated March 14, 2025 re: the Proposed Committee Settlement Plan	Bates-stamp Debtors 1206-1217
43.	Monthly Cash Forecast dated April 23, 2025	Bates-stamp Debtors 8716-8719
44.	Committee Meeting Minutes dated January 15, 2025	Bates-stamp Committee 00632-00633
45.	Committee Meeting Minutes dated January 24, 2025	Bates-stamp Committee 00624-00625
46.	Committee Meeting Minutes dated February 5, 2025	Bates-stamp Committee 00626-00627
47.	Committee Meeting Minutes dated March 12, 2025	Bates-stamp Committee 00630-00631
48.	Committee Meeting Minutes dated March 14, 2025	Bates-stamp Committee 00634
49.	Committee Meeting Minutes dated March 19, 2025	Bates-stamp Committee 00622-00623
50.	Email from A. Smith to E. Winston dated January 14, 2025 re: settlement of MEPP claims	Whittman Ex. 04

51.	Email from P. Dash to A. Smith dated February 7, 2025 re: Central States resolution	Bates-stamp Debtors 1249-1256
52.	Email from A. Smith to Milbank dated February 12, 2025 re: recovery analysis	Bates-stamp Debtors 2050-2055
53.	Attachment to email from A. Smith email dated February 12, 2025 re: recovery analysis	Bates-stamp Debtors 2056-2057
54.	Email from E. Dexter to M. Lahaie dated February 13, 2025 re: undiscounted amount of claims Milbank represents	Bates-stamp Committee 0486-0487
55.	Attachment to email from E. Dexter to M. Lahaie dated February 13, 2025 re: the claims recovery scenario	Bates-stamp Committee 0488
56.	Email from E. Dexter to M. Lahaie dated February 20, 2025 re: settlement term sheet for MEPP withdrawal liability claims	Bates-stamp Committee 0463
57.	Attachment to email from E. Dexter to M. Lahaie dated February 13, 2025 re: settlement term sheet for MEPP withdrawal liability claims	Bates-stamp Committee 0464-0470
58.	Email from E. Dexter to E. Winston dated February 26, 2026 re: settlement of MEPP withdrawal liability claims	Whittman Ex. 10
59.	Email from M. Doheny to Yellow Corporation board and Debtors' counsel dated February 28, 2025 re: third circuit appeal	Bates-stamp Debtors 1202
60.	Email from M. Lahaie to A. Smith dated March 13, 2025 re: third circuit appeal	Bates-stamp Committee 11321-11323
61.	Email from M. Lahaie to E. Dexter dated March 19, 2025 re: settlement plan proposal deck	Bates-stamp Committee 0434
62.	Email from P. Nash dated March 21, 2025 to Committee counsel re: New England Teamsters proofs of claim	Bates-stamp Debtors 1111-1112
63.	Email from K. Zuzolo to Debtors' counsel dated April 23, 2025 re: recovery analysis	Bates-stamp Committee 0221-0224
64.	Email from S. Chan to E. Winston dated April 23, 2025 re: MFN MEPP estimates	Whittman Ex. 15
65.	Email from V. DeBella to K. Suzolo re: preliminary observations	Bates-stamp Committee 0167
66.	Email from K. Zuzolo to: Milbank dated April 29, 2025 re: chart of MEPP claim calculations	Bates-stamp Committee 0058-0061

67.	Email from E. Dexter to K. Zuzolo dated April 29, 2025 re: MEPP claim calculations	Bates-stamp Committee 0062-0064
68.	Email from M. Lahaie to Debtors' counsel dated May 9, 2025 re: third amended plan filing	Bates-stamp Debtors 4298-4305
69.	Email from J. Chatalian to Groom dated May 12, 2025 re: waterfall analysis	Bates-stamp Committee 0008
70.	Attachment to email from J. Chatalian to Groom dated May 12, 2025 re: waterfall analysis attached to email dated May 12, 2025	Bates-stamp Committee 0009-00011
71.	Email from M. Lahaie to Groom dated May 14, 2025 re: claim estimates	Bates-stamp Committee 0302-0305
72.	Email from K. Zuzolo to PBGC dated May 22, 2025 re: meeting coordination	Bates-stamp Committee 0006-0007
73.	Debtors' Responses and Objections to MFN Partners, LP and Mobile Street Holdings, LLC First Set of Interrogatories	
74.	Each Debtors Monthly Operating Reports for the reporting period of January 2025 to March 2025	
75.	Sixteenth Monthly Fee Application of Akin Gump Strauss Hauer & Feld LLP, as Lead Co-Counsel to the Official Committee of Unsecured Creditors of Yellow Corporation, et al., for the Period from November 1, 2024 Through and Including November 30, 2024	5645
76.	Nineteenth Monthly Fee Application of Akin Gump Strauss Hauer & Feld LLP, as Lead Co-Counsel to the Official Committee of Unsecured Creditors of Yellow Corporation, et al., for the Period from February 1, 2025 Through and Including February 28, 2025	6167
77.	Twentieth Monthly Fee Application of Akin Gump Strauss Hauer & Feld LLP, as Lead Co-Counsel to the Official Committee of Unsecured Creditors of Yellow Corporation, et al., for the Period from March 1, 2025 Through and Including March 31, 2025	6245
78.	Sixteenth Monthly Fee Application of Benesch, Friedlander, Coplan & Aronoff LLP, for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Delaware Counsel to the Official Committee of Unsecured Creditors for the Period from November 1, 2024 Through November 30, 2024	5646
79.	Seventeenth Monthly Fee Application of Benesch, Friedlander, Coplan & Aronoff LLP, for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Delaware Counsel to the Official Committee of Unsecured Creditors for the Period from December 1, 2024 Through December 31, 2024	5647

80.	Eighteenth Monthly Fee Application of Benesch, Friedlander, Coplan & Aronoff LLP, for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Delaware Counsel to the Official Committee of Unsecured Creditors for the Period from January 1, 2025 Through January 31, 2025	5887
81.	Nineteenth Monthly Fee Application of Benesch, Friedlander, Coplan & Aronoff LLP, for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Delaware Counsel to the Official Committee of Unsecured Creditors for the Period from February 1, 2025 Through February 28, 2025	6168
82.	Twentieth Monthly Fee Application of Benesch, Friedlander, Coplan & Aronoff LLP, for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Delaware Counsel to the Official Committee of Unsecured Creditors for the Period from March 1, 2025 Through March 31, 2025	6426
83.	Sixteenth Monthly Fee Application of Huron Consulting Services LLC, as Financial Advisor to the Official Committee of Unsecured Creditors of Yellow Corporation, et al., for the Period from November 1, 2024 Through and Including November 30, 2024	5648
84.	Seventeenth Monthly Fee Application of Huron Consulting Services LLC, as Financial Advisor to the Official Committee of Unsecured Creditors of Yellow Corporation, et al., for the Period from December 1, 2024 Through and Including December 31, 2024	5888
85.	Eighteenth Monthly Fee Application of Huron Consulting Services LLC, as Financial Advisor to the Official Committee of Unsecured Creditors of Yellow Corporation, et al., for the Period from January 1, 2025 Through and Including January 31, 2025	6057
86.	Nineteenth Monthly Fee Application of Huron Consulting Services LLC, as Financial Advisor to the Official Committee of Unsecured Creditors of Yellow Corporation, et al., for the Period from February 1, 2025 Through and Including February 28, 2025	6427
87.	Sixteenth Monthly Fee Application of Miller Buckfire for Compensation for Services Rendered and Reimbursement of Expenses Incurred from November 1, 2024 Through and Including November 30, 2024	6094
88.	Seventeenth Monthly Fee Application of Miller Buckfire for Compensation for Services Rendered and Reimbursement of Expenses Incurred from December 1, 2024 Through and Including December 31, 2024	6095

89.	Eighteenth Monthly Fee Application of Miller Buckfire for Compensation for Services Rendered and Reimbursement of Expenses Incurred from January 1, 2025 Through and Including January 31, 2025	6110
90.	Fourteenth Monthly Fee Application of Kirkland & Ellis LLP and Kirkland & Ellis International LLP, Attorneys For the Debtors and Debtors in Possession, for the Period from November 1, 2024 Through and Including December 31, 2024	5660
91.	Fifteenth Monthly Fee Application of Kirkland & Ellis LLP and Kirkland & Ellis International LLP, Attorneys For the Debtors and Debtors in Possession, for the Period from January 1, 2025 Through and Including January 31, 2025	5946
92.	Sixteenth Monthly Fee Application of Kirkland & Ellis LLP and Kirkland & Ellis International LLP, Attorneys For the Debtors and Debtors in Possession, for the Period from February 1, 2025 Through and Including February 28, 2025	6163
93.	Seventeenth Monthly Fee Application of Kirkland & Ellis LLP and Kirkland & Ellis International LLP, Attorneys For the Debtors and Debtors in Possession, for the Period from March 1, 2025 Through and Including March 31, 2025	6420
94.	Sixteenth Monthly Application for Compensation and Reimbursement of Expenses of Pachulski Stang Ziehl & Jones LLP, as Co-Counsel for the Debtors and Debtors in Possession, for the Period From November 1, 2024 Through November 30, 2024	5454
95.	Seventeenth Monthly Application for Compensation and Reimbursement of Expenses of Pachulski Stang Ziehl & Jones LLP, as Co-Counsel for the Debtors and Debtors in Possession, for the Period From December 1, 2024 Through December 31, 2024	6121
96.	Eighteenth Monthly Application for Compensation and Reimbursement of Expenses of Pachulski Stang Ziehl & Jones LLP, as Co-Counsel for the Debtors and Debtors in Possession, for the Period From January 1, 2025 Through January 31, 2025	6122
97.	Nineteenth Monthly Application for Compensation and Reimbursement of Expenses of Pachulski Stang Ziehl & Jones LLP, as Co-Counsel for the Debtors and Debtors in Possession, for the Period From February 1, 2025 Through February 28, 2025	6307
98.	Sixteenth Monthly Application of Alvarez & Marsal North America, LLC for Allowance of Compensation and Reimbursement of Expenses for the Period November 1, 2024 to and Including November 30, 2024	5585
99.	Seventeenth Monthly Application of Alvarez & Marsal North America, LLC for Allowance of Compensation and	5809

	Reimbursement of Expenses for the Period December 1, 2024 to and Including December 31, 2024	
100.	Eighteenth Monthly Application of Alvarez & Marsal North America, LLC for Allowance of Compensation and Reimbursement of Expenses for the Period January 1, 2025 to and Including January 31, 2025	6037
101.	Nineteenth Monthly Application of Alvarez & Marsal North America, LLC for Allowance of Compensation and Reimbursement of Expenses for the Period February 1, 2025 to and Including February 28, 2024	6296
102.	Sixteenth Monthly Application of Ducera Partners LLC for Allowance of Compensation and Reimbursement of Expenses for the Period from November 1, 2024 through November 30, 2024	6006
103.	Seventeenth Monthly Application of Ducera Partners LLC for Allowance of Compensation and Reimbursement of Expenses for the Period from December 1, 2024 through December 31, 2024	6118
104.	Eighteenth Monthly Application of Ducera Partners LLC for Allowance of Compensation and Reimbursement of Expenses for the Period from January 1, 2025 through January 31, 2025	6050
105.	Nineteenth Monthly Application of Ducera Partners LLC for Allowance of Compensation and Reimbursement of Expenses for the Period from February 1, 2025 through February 28, 2025	6191
106.	Twentieth Monthly Application of Ducera Partners LLC for Allowance of Compensation and Reimbursement of Expenses for the Period from March 1, 2025 through March 31, 2025	6219
107.	Fifteenth Monthly Fee Statement of Ernst & Young LLP as Tax Services Provider to the Debtors for Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from November 1, 2024 Through and Including November 30, 2024	5273
108.	Sixteenth Monthly Fee Statement of Ernst & Young LLP as Tax Services Provider to the Debtors for Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period From December 1, 2024 Through and Including December 31, 2024	5520
109.	Seventeenth Monthly Fee Statement of Ernst & Young LLP as Tax Services Provider to the Debtors for Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period From January 1, 2025 Through and Including January 31, 2025	5859

110.	Eighteenth Monthly Fee Statement of Ernst & Young LLP as Tax Services Provider to the Debtors for Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period From February 1, 2025 Through and Including February 28, 2025	6020
111.	Nineteenth Monthly Fee Statement of Ernst & Young LLP as Tax Services Provider to the Debtors for Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period From March 1, 2025 Through and Including March 31, 2025	6194
112.	Twentieth Monthly Fee Statement of Ernst & Young LLP as Tax Services Provider to the Debtors for Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period From April 1, 2025 Through and Including April 30, 2025	6445
113.	Deposition of Brian Whittman (Designations and Counter Designations)	
114.	Deposition of Matthew Doheny (Designations and Counter Designations)	
115.	Depositions of Meredith A. Lahaie (Designations and Counter Designations)	
116.	Depositions of Brad R. Berliner (Designations and Counter Designations)	
117.	<i>Any document or pleading filed in the above captioned cases</i>	
118.	<i>Any exhibit necessary for impeachment or rebuttal purposes</i>	
119.	<i>Any exhibit identified or offered by any other party</i>	

RESERVATION OF RIGHTS

The MFN Parties reserve all rights, including but not limited to the right to amend, revise, supplement, or withdraw this Witness and Exhibit List at any time, to designate additional witnesses and exhibits, to call or cross examine any person identified as a witness by any other party in interest or introduce any document identified as an exhibit by any other party in interest, and to offer additional witnesses and exhibits at the Hearing for purposes of impeachment or rebuttal, in response to witnesses and evidence offered by any other party, and for any other permissible purpose under the Federal Rules of Bankruptcy Procedure, the Federal Rules of Civil Procedure, and the Federal Rules of Evidence. The MFN Parties also reserves the right to amend

this Witness and Exhibit List at any time prior to the Hearing, including, without limitation, in the event of the filing of any objections, responses, replies, supplemental declarations, or other filings in connection with the Hearing.

Dated: June 13, 2025
Wilmington, Delaware

Respectfully Submitted,

/s/ Maria Kotsiras
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